

VRS Certification Application
Federal Communications Commission
Chief, Consumer & Governmental Affairs Bureau
TRS Certification Program
Washington, DC
20554

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FCC Mail Room

I. Description of forms of TRS to be provided

A. It is the intention of DeafNet, LLC to operate as a Video Relay Service provider, adhering to all pertaining codes, rules, regulations, and mandatory minimum standards set forth by the Federal Communications Commission of the United States of America. In this narrative, we will intend to outline our operations and specify how these orders of operation will comply with the Commission's mandatory minimum standards established for VRS providers.

II. Description of how provider will meet all non-waived mandatory minimum standards applicable to each form of TRS offered

A. Operational Standards

1. Communications Assistants (CAs)

a. DeafNet will hire only qualified, professionally trained, sign language interpreters to work as Communications Assistants. Preference will be given to nationally certified interpreters holding RID, NAD (level 4 and above), and NIC certifications. Each interpreter will be screened and evaluated based on their skill level before being allowed to provide interpretation of any video relay calls placed through DeafNet VRS. Interpreters will be evaluated based on their ability to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Assessments will take place via resume evaluation, national certification verification, and when necessary, video assessment of interpreters' skill level by nationally certified sign language interpreters with extensive experience in the VRS field.

All hired interpreters will be trained in an orientation regarding the proper protocol of handling VRS calls, so as to ensure adherence to the Commission's mandatory minimum standards before being allowed to interpret any video relay calls. Each interpreter's training orientation will include instruction on confidentiality and conversation content, types of calls, handling of emergency calls, speed of answer, and how to handle customer's complaints. In addition, as part of this training orientation, interpreter CAs will be instructed that when answering and placing a VRS call, they are required to stay on a call for a minimum of 10 minutes. Interpreters will also be instructed during their initial orientation training to conduct all VRS calls between a VRS user and a voice caller in real-

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time.

DeafNet's call handling system used by our CAs will have the ability to transfer a call at any time to an interpreter of a specific "skill set" requested by the VRS caller, including a CA of a specific gender, or a Spanish-speaking CA.

2. Confidentiality and Conversation Content

a. Per section 705 of the Communications Act, 47 U.S.C. 605, each CA will be instructed that they will be prohibited from disclosing the content of any relayed conversation, regardless of content. They will also be instructed that they are prohibited from recording any content of any conversation beyond the duration of a call. DeafNet will not provide any electronic equipment capable of recording any call content and will prohibit the use of any CA using any type of recording device while logged into DeafNet's call system. Communications Assistants will be instructed that they may temporarily retain information from a particular call in order to facilitate the completion of consecutive calls, or to aid in navigating calls made to time-sensitive automated response systems. This information will be relayed via instant messaging from the VRS user to the CAs workstation or written down on dry-erase whiteboards by the CA, when requested by the VRS caller. Upon completion of the call, the CA will discard any temporary instant messaging conversations and CAs will be instructed that any information written on dry-erase whiteboards must be erased and discarded immediately upon completion of the call. To ensure confidentiality of VRS users is maintained, each CA will be stationed in a location secure from the view of others. Additional CAs will be able to see a VRS caller only if the call is transferred to another CA to process. CAs will be instructed that they are prohibited from viewing another video interpreter's caller if the call has not been transferred to them. DeafNet will retain information on calls only to aid in the billing process. All billing information will be strictly confidential and will not be accessible to anyone other than those responsible for billing matters. This data will not be used for any purpose other than to connect the VRS user with the called parties desired by that VRS user. Such information shall not be sold, distributed, shared, or revealed in any other way by DeafNet or its employees, unless compelled to do so by lawful order.

During interpreters training orientation, emphasis will be placed upon the prohibition of intentionally altering the content of a relayed conversation, regardless of subject matter. If an interpreter feels he or she is not capable of effectively interpreting any call content, he or she will have the ability to transfer the call to a more qualified CA or request a team interpreter to aid in the translation process. CAs will be trained to allow the VRS user to maintain control of the conversation.

3. Types of Calls

a. CAs will be prohibited from refusing sequential calls or from limiting the length of calls, regardless of time of day. A CA will have the ability to transfer the call to another available CA in order to accommodate unlimited call lengths. If a CA has an ethical code of conduct conflict with a specific caller (i.e. interpreting for a family member), and can identify the VRS caller via their caller ID, the CA may return the call to

queue and allow another CA to accept that call.

DeafNet's call handling system will be able to accommodate any type of call normally provided by telecommunications carriers. DeafNet's call handling system will be able to accommodate video to voice calls, and voice to video calls. DeafNet's call system will also allow video callers to connect via VCO to the voice caller, with the aid of a CA. The CA can then place a voice call to the VRS user's desired party and let the VRS user voice for himself/herself.

4. Handling of Emergency Calls

- a. DeafNet will not process 911 emergency calls and will encourage our callers to use traditional relay services (such as text relay via TTY) for 911 and other emergency calls.

B. Technical Standards

1. Speed of Answer

- a. In order to accommodate the Commission's speed of answer requirement of answering all calls within 120 seconds, DeafNet will maintain a national scheduling committee consisting of individuals whose sole responsibility is to schedule the proper amount of CAs necessary to accommodate typical call volume, based on the time of day, day of the week, and events surrounding these dates. DeafNet's call handling system will route incoming calls to the next available CA. In the event that a CA does not answer the call routed to their station within a specific amount of time, the call will be placed back in queue and routed to the next available CA so as to ensure wait times are kept below the 120 second standard. We anticipate our call volume to increase at a rate of 20% each month for the first year, and at a rate of 32% after the first year of operation. We will be heavily involved in recruiting qualified and certified interpreters nationally with attractive pay and other working benefits as our call volume increases in order to accommodate the mandatory speed of answer requirements.

2. Equal Access to Interexchange Carriers

- a. DeafNet will not in any way prohibit a VRS user from using other VRS providers' services.

3. TRS Facilities

- a. DeafNet's VRS services will operate 24 hours a day, 7 days a week, 365 days a year and will be free for all video callers, as well as voice callers. Our system's operating hardware will be equipped with redundancy features and uninterruptible power sources for emergency use. Each CAs workstation will also be equipped with back-up power sources so as to ensure service accessibility during power outages.

4. Technology

- a. It is DeafNet's intentions to encourage the development of improved technology that fosters the availability of telecommunications to a person

with speech and hearing disabilities. We hope to advance the functionality and every-day-use of video relay with our innovative services, and hope to encourage other VRS providers to do the same.

5. Caller ID

- a. When a video caller attempts to reach a voice caller through the public network via DeafNet's VRS services, the caller ID to one of DeafNet's voice access lines will be passed through to the called party.

C. Functional Standards

1. Consumer Complaint Logs

- a. DeafNet will allow consumers to submit complaints about our services through e-mail, DeafNet's website, or by mail. All methods of submitting complaints will be outlined on the DeafNet website clearly and concisely. Other informational materials on complaint procedures will be available for VRS users and will be disseminated throughout the community via brochures and pamphlets. A log of all consumer complaints will be maintained until the next certification is granted. Each complaint logged will include the following; the date the complaint was filed, the nature of the complaint, a summary of DeafNet's response to the complaint, and the date of DeafNet's response to the complaint. DeafNet will employ an individual who will be responsible for maintaining these logs and attempt to resolve the complaints held therein.

- b. DeafNet will also submit summaries of complaint logs to the Commission indicating the number of complaints received during any 12 month period requested by the Commission, including the 12-month period ending May 31, to be submitted to the Commission by July 1 of each year. Complaint procedures will be readily posted on DeafNet's website and easily accessible from DeafNet's home page. VRS callers may also ask a CA about how to submit a complaint. All CAs will be informed on how to aid the VRS caller in submitting a complaint via mail, e-mail, or through DeafNet's website.

2. Contact Persons

- a. DeafNet will submit to the Commission a point of contact where VRS consumer information and complaints may be directed. This submission will include the 1) the name and address of the individual that receives complaints, grievances, inquiries, and suggestions 2) the voice and TTY telephone numbers, fax number, e-mail address, and web address 3) the physical address to which correspondence should be sent. Currently this individual's information is below:

Clayton Call
16136 W. Glenrosa
Goodyear, AZ
85395
(v) 480-233-1070
clayton@deafnetvrs.com
www.deafnetvrs.com

A videophone, fax, and TTY number and updated contact information will be submitted upon approval of DeafNet's application.

3. Public Access to Information

a. DeafNet will ensure public access to information about our services via placement of brochures, pamphlets, fliers, and other marketing materials throughout the community. DeafNet will disseminate information via each state's Commission for the Deaf and Hard of Hearing agencies' e-mail trees, as well as holding public information meetings and setting up demo-stations where individuals can learn about VRS services in person. DeafNet will also have information for the public to access readily available on our website. As DeafNet grows and awareness of our services increases, DeafNet will continue to invest in efforts to disseminate public information about our services and about video relay to the public.

4. Rates

a. All VRS calls made shall be free of charge to both video and voice callers, regardless of length or time of day.

5. Jurisdictional Separation of Costs

a. Costs of providing VRS shall be separated in accordance with jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.

6. Data Collection from TRS Providers

a. Information obtained for billing purposes will be submitted to the National Exchange Carrier Association and will include total VRS minutes of use, total operating expenses, and total VRS investment in general accordance with part 32 of the Communications Act, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements. Utilizing several voice over IP and video over IP server systems, DeafNet will be able to capture the necessary data in order to calculate accurate and truthful data for billing purposes. DeafNet will utilize generally accepted accounting practices and employ various software applications to track expenses, credits, debits, and other changes to our financial and accounting records so as to maintain the necessary operating data to provide to the TRS fund administrator.

7. Payment to TRS Providers

a. DeafNet shall submit reports of VRS minutes of use to the Fund administrator in order to receive reimbursement payments. DeafNet will file a form prescribed by the administrator which is consistent with parts 32 and 36 procedures reasonably tailored to meet the needs of TRS providers.

b. DeafNet shall notify the Fund administrator (National Exchange Carrier Association, Inc.) of our intent to participate in the TRS Fund 30 days prior to submitting reports of TRS minutes of use in order to receive

payment settlements for VRS.

8. Notice of Substantive Change

a. DeafNet will notify the Commission of substantive changes in our VRS programs, services, and features within 60 days of when such changes occur.

9. Annual Compliance

a. DeafNet will file with the Commission, on an annual basis, a report providing evidence that we are in compliance with 64.604.

III. Description of provider's procedures for ensuring compliance with all applicable TRS rules

A. Personnel Training and Orientation

1. Personnel responsible for ensuring ongoing compliance with all applicable TRS rules will be properly trained and instructed regarding their responsibilities. This includes, but is not limited to, CAs, scheduling staff, technicians, and billing personnel.

a. CAs

I. All CAs will be qualified sign language interpreters with the ability to interpret effectively, accurately, and impartially, both receptively and expressively using any necessary specialized vocabulary. Interpreters will be screened and assessed based on their qualifications, certifications, and skills. Assessments will take place via resume evaluation, national certification verification, and when necessary, video assessment of interpreters' skill level, by nationally certified sign language interpreters with extensive experience in the VRS field.

When an interpreter has been evaluated and found competent to interpret as a CA, they will go through an extensive orientation and training on the proper protocol of handling a VRS call using DeafNet's call handling system. Each interpreter's training orientation will include instruction on the following:

- Confidentiality and conversation content
- Types of calls
- Handling of emergency calls
- Speed of answer
- Minimum call length requirement before transfer
- VRS interpreting protocol
- Consumer complaints

CAs will be reminded frequently through email communications, staff meetings, and training workshops of their responsibilities to ensure compliance with all applicable TRS rules.

b. Scheduling Staff

i. Staff scheduling interpreters to work as CAs will be responsible for scheduling the proper amount of CAs necessary to accommodate typical call volume, based on the time of day, day of the week, and events surrounding these dates. Queue analysis will be used to identify the appropriate number of CAs necessary to ensure each caller's wait time is reduced to less than 120 seconds before connecting to an available CA.. Scheduling Staff's primary responsibility will be to ensure the Commission's speed of answer requisites is met on a daily basis and to keep operating costs at a minimum.

c. Technicians

i. All technicians and software personnel will be responsible for deploying an efficient and user-friendly technical environment for VRS users. Technicians will ensure a call can be transferred to a CA of a specific gender at the request of a VRS user. Technicians will also be responsible for maintaining DeafNet's software and hardware environment and ensuring all information necessary for billing purposes is accurately recorded, logged, categorized, and kept confidential.

d. Billing Personnel

i. Individuals responsible for billing will obtain information from DeafNet's call handling system via the utilization of several software applications. These software applications have the ability to capture accurate and truthful call data from the servers that route VRS calls to DeafNet's CAs. Billing personnel will be instructed that this information is to be kept entirely confidential and used to accurately and truthfully record billable minutes to be submitted to the TRS Fund administrator. All billing data obtained will not be used for any purpose other than to connect the VRS user with the called parties desired by that VRS user. Such information shall not be sold, distributed, shared, or revealed in any other way by DeafNet or its employees, unless compelled to do so by lawful order.

IV. Description of provider's complaint procedures

A. VRS users who wish to submit a complaint may do so via e-mail, DeafNet's website, or by mail. Upon receiving a complaint, DeafNet will attempt to address the complaint with the sender within 7 working days from the date the complaint was received. Once a response has been submitted to the sender from DeafNet, the complaint will immediately be logged into a database and will include the date the complaint was filed, the nature of the complaint, a summary of DeafNet's response to the complaint, and the date of DeafNet's response to the complaint. DeafNet will continue correspondence with the individual to help resolve their complaint if necessary. DeafNet will employ an individual who will be responsible for maintaining these logs and attempt to resolve the complaints held therein.

B. DeafNet will file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Currently, the information for this individual can be found below:

Clayton Call
16136 W. Glenrosa
Goodyear, AZ
85395
(v) 480-233-1070
clayton@deafnetvrs.com
www.deafnetvrs.com

C. A videophone, fax, and TTY number and updated contact information will be submitted upon approval of DeafNet's application.

V. Narrative describing any areas in which the provider's service will differ from the applicable mandatory minimum standards

A. DeafNet's VRS services will comply with all applicable mandatory minimum standards.

VI. Demonstration of status as common carrier

A. DeafNet VRS is applying for eligibility for compensation from the Fund for the provision of video relay services under the fourth eligibility prong, which allows common carriers seeking to offer VRS and receive compensation to do so without being part of a certified state program or contracting with an entity.

VII. Statement that the provider will file annual compliance reports demonstrating continued compliance with these rules

A. DeafNet VRS will continue to file annual compliance reports demonstrating continued compliance with all FCC's rules pertaining to providing video relay services.